April 20, 2002

6509 Beaver Dam Road
Beltsville, MD 20705

RE: Comments to Docket Number FAA-2002-11580, Enhanced Security Procedures for Operations at Certain Airports in the Washington, DC Metropolitan Area Special Flight Rules Area (SFAR 94):

Eliminate it or drastically reconfigure it.

In a memo by Dr. Kenneth Nolde (USAF Ret), former Senior Analyst with the Defense Intelligence Agency that was available here http://www.potomac-airfield.com/28_february_2002.htm at the time I wrote this, this analyst concluded "Given of their limitations as vehicles of destruction, security risk from GA aircraft are negligible. Moreover, given the choice between GA planes and ground vehicles as delivery platforms, ground is the clear winner."

Given the poor security at the larger airports in our country that have been depicted in articles as recently as in the "Security Check: New Turf War Slows Campaign to Improve Screen at Airports", Wall Street Journal, March 28, 2002, our limited resources would be better put to use there than banning GA aircraft.

Please explain the dichotomy between banning most small aircraft operations at airports toward the edges of the TFR and allowing the operation of large aircraft into DCA, which is located at the heart of the capital. A large percentage of these aircraft operating into DCA do not have air marshals aboard. Even if they did, the air marshals would be ineffective if the pilot and or copilot decided to deviate from the flight plan while in the immediate vicinity of the capital.

Please explain the logic that allows a Frontier Airlines jet into restricted airspace over the White House, the Capital and then the Naval Observatory while most small aircraft are banned from airports miles away from these sites. The Frontier Airlines jet was only the latest incident. On December 22, 2001 a commercial aircraft strayed into the restricted airspace. On January 4th, 2002 an American Airlines flight taking off from Reagan National made an error similar to that of the Frontier aircraft. On March 8, a U.S. Airways aircraft landing at Reagan National Airport didn't comply with instructions from ATC and entered the restricted airspace.

Please explain the logic of allowing large aircraft capable of operation at high speeds, even those arriving from foreign destinations with unknown crews into Dulles and BWI. The requirement that the foreign airline provide a list of crew and passengers in advance of the aircraft landing in the US is meaningless for the situation being discussed here. The departure of aircraft fully loaded with fuel from Dulles and BWI is also a far greater risk than the GA aircraft that are capable of operating into and out of the three airports in the TFR. The transit time for one of these large, heavy aircraft, potentially fully loaded

with fuel or worse from Dulles or BWI airport area to the Capital or White House would be shorter than for a GA aircraft using College Park, Potomac or Hyde.

On September 11 it was clearly demonstrated that the threat not small GA aircraft. The September 11th I am speaking of was in 1994 when Frank Corder stole a small aircraft just before midnight and crashed it into the White House at 2:00 am on September 12, 1994. This was again demonstrated on September 11, 2001 when it took large fully fueled turbine-powered aircraft to inflect the amount of damage that was done that day. Once again this was demonstrated again in Tampa, Florida on January 6, 2002 and again in Milan, Italy a few days ago. The GA aircraft carry so little fuel that there was no fire in Tampa and in Milan the fire was extinguished by the buildings fire system.

Why are we wasting our time and limited resources on aircraft that are not suitable to be kinetic energy weapons or guided missiles? For the purpose of inflicting significant damage the aircraft would have to be large, fast and laden with fuel. For the purpose of embarrassment the threat would more likely come from remotely piloted vehicles, which could be launched from a parking lot or even someone's backyard. These vehicles could be autonomous or radio controlled. At this point it is unlikely they could carry a significant payload.

In addition, on April 6, 2002 a C-182RG, 756EM landed at College Park. This was the first transient into College Park since 9/11/01. The pilot was coming down to see the Cherry Blossoms from the Philadelphia area. The pilot, his wife and another passenger were greeted by a phone call from National Airport. The police and Secret Service arrived a little later.

When the pilot got his preflight briefing he asked if there were any special rules about going into CGS. He was told no by the flight service specialist. He filed IFR. Baltimore "dumped" him a few miles from CGS after telling him the airport was x miles, at y o'clock. They told him to cancel IFR and squawk VFR. The police and Secret Service 'vetted' him in about 15 minutes and he then filed and returned to the Philadelphia area in his aircraft with his passengers.

Personally I have been affected by the SFAR's "Catch-22" implications when my airplane partner called to say the radios were not working in our aircraft. The extended closure of College Park and the current draconian operating restrictions has forced the FBO to leave. There is no maintenance facility on the field and under the current rules the airplane can't be flown to another airport.

Why is the TFR as large as it is? The size of the restricted area around Camp David is 8 miles. If the 8 miles is good enough to protect the President while he is there, it should be good enough to protect him when he is in Washington D.C. In fact there are many other security procedures in effect in Washington D.C. that should offer the President and the presidential line of succession far greater protection than that which is available at Camp David.

Clearly with the departure of the CAP over Washington D.C. the threat has declined. With it should go the current rules and regulation of SFAR 94.

About 400 pilots successfully went through the vetting process. At this point, sixty days later, only about 125 of the vetted pilots have operated from one of the three airports due to the onerous operational procedures. So if you refuse to eliminate or drastically reconfigure SFAR 94 I suggest the following:

Define the TFR boundaries off the VORTAC at DCA and in nautical miles. This gives all pilots easy to use boundaries. A TFR partially located 15 nautical miles from DCA VOR and partially at 12 nautical miles would be coincident with well marked on the existing Washington Terminal Chart. The transition points to and from the 15-mile arc from the 12-mile arc should be easily identified locations, prephaps radials off the DCA VORTAC. An alterative would be a TFR at on the 12-mile arc with a cutout for Freeway. Either alterative would enable DME equipment and any Loran and GPS equipment to keep pilots safely away from the TFR. The existing TFR with its central point at the Washington Monument is not locatable with DME and any existing points in stored in a LORAN or GPS.

Permit pattern work at the three airports in question. The lack of practice operations at the three airports creates a safety problem. Already one pilot at College Park who should have gone around during landing but among other reasons: the concern of creating a 'pop up' caused the pilot to continue the approach causing an estimated $30,000 in damages to the aircraft.

Allow traffic between the airports in the TFR. If a pilot is cleared to operate at one of the airports there is no logical reason for prohibiting the same pilot from operating into and out of another one of the three airports.

Permit practice approaches at Freeway Airport. Right now the edge of the TFR cuts into the instrument approach course. Permit practice approaches at Andrews and Davision. Dropping the ability of pilots to use the Andrews ILS approaches and Davision for practice will contribute to the already dangerous congestion at Fredrick.

Allow transients into the three GA airports. College Park it receives 40% of its revenue from transient operations and it's continued viability is at stake. It will likely be closed if the number of operations continues at the current low level. Transients could be allowed under several different scenarios 1) Tight VFR corridors into the three airports inside the TFR. 2) By Prior Permission only – a 24-hour advance call to a designated number with the pilot gave required information. 3) Via portal airport at Tipton staffed by TSA for CGS and portal airport at Maryland staffed by TSA for Hyde and Potomac.

Another alternative would be to take the Class B airspace to the floor at the 12-mile ring. A Ground Control Outlet or GCO could be installed at the airports with direct access to the controllers. The aircraft could operate out of the three airports like they were 'towered' airports via the GCO. Operations into the three airports would be under the

normal rules to enter Class B airspace. This should not be difficult to do with the Potomac Tracon coming online later this year.   This would require all departing operations to receive a discrete squawk code before becoming airborne. It would require all aircraft desiring to land at these airports to contract ATC before entering the Class B airspace. Eventually closed circuit television could be installed at that would provide a view of both ends of the runway to the controllers at National. This picture would also be displayed at the Maryland National Capital Park Police Headquarters for College Park and the Prince Georges County Police Headquarters for Potomac and Hyde. This would, in effect create an offsite 'tower' for these airports.

To require transients to go through the same process as the based pilots were required to do is a joke. They will be forced to travel to the nearest Secret Service facility to get their fingerprints taken. Then they will have to get the nearest FBI office to get them to do a criminal background check. Finally they will have to show up at the FSDO to have their FAA background check. Where will they have to go to when they want to view the security briefing tape?

Remove the requirement for a medical certificate. Sport plane pilots will not be required to have one. Under certain circumstances flight instructors giving instruction are not required to have one.

Remove the requirement for a flight plan to be filed with Leesburg for departures from the three airports. For example, College Park is a poster child for GA airport security. Access to the field is closely monitored. At the most a call to Clearance Delivery should be all that is required. They can shuffle the same list the Leesburg currently does. Any contractual problems with the union can be handled under the same rubric of 'National Security' that is quoted to us whenever we ask why SFAR 94 needs to exist at all.

Establish a method for the submission of flight plans via the Web.   This would provide better security than the use of the phone.

I have two questions specifically about the SFAR as it currently exists. 1) On page 18, what is an "aeromedical services aircraft"? Does an aircraft operating as "Lifeguard" qualify? 2) On page 32 (2) states "Successfully compete a background check by a law enforcement agency…" What is the qualification of "success"? It appears to be something other than (4) "Not have been convicted or found not guilty by reason of insanity…"

Kurt Schneckenburger

kschneckenburger@erols.com